REMARKS

Applicants wish to thank the Examiner for the interview with applicants' representatives on November 16, 2004.

In the most recent Office Action dated June 3, 2004, the Examiner rejects claims 1-20 under 35 USC § 102(b) as being anticipated by U.S. Patent No. 5,764,972 to Crouse *et al.* ("Crouse").

The Applicants amend claims 1-6, 9-10, and 12-20 to address concerns raised by the Examiner during the November 16, 2004 interview and to more fully claim aspects of the present invention. No new matter has been added. For at least the reasons set forth below, the Applicants respectfully assert that the pending claims are patentable over the prior art of record and request their allowance.

Crouse generally discusses an archiving file system ("AFS") specifically designed to support the storage of, and access to, remote files stored on network data servers. [Col. 4, lines 22-25] Files are archived across secondary storage media on the network data servers based on a set of hierarchically selectable archival attributes that are selectively assigned to each remote file. [Col. 4, lines 25-29] In Crouse, a request table tracks all removable media that can be accessed by the system for storing and retrieving files. [Col. 17, lines 48-52] An AFS control program also uses a removable media resource file to track storage of and access paths to remote files on these removable media and thus allows these remote files to be integrated into the system's file tree structure. [Col. 19, lines 37-44] If access to a remote file is requested, the system uses the removable media resource file in conjunction with the request table to locate and

mount or otherwise make available the indicated removable media storing the requested file as necessary. [Col. 19, line 38 – Col. 20, line 39]

Thus, while the system of Claim 1 is directed to exporting or removing removable media from a storage library according to a schedule, the system in Crouse is only concerned with migration and retrieval of electronic data at the file level. To the extent that removable media is discussed, the discussion is only ancillary at best to further describe actions being taken with respect to files. For example, Crouse does contain a migration attribute, but only with respect to files and migrating them to removable media. The attribute is associated with the files, not the removable media as in claim 1. As another example, Crouse does discuss removing media from a library, but only in the context of removing a mounted piece of media in order to mount or otherwise make available in its place another piece of media containing a requested file as specified by the removable media resource file and the request table. Unlike claim 1, nowhere does Crouse address exporting media according to a schedule, export characteristics, etc. The system in Crouse is only directed to logical entities, such as files and files structures, and not to physical entities, such as pieces of removable media as in claim 1.

Thus, Crouse is directed to making removable media available to the system for use by the system. By contrast, claim 1 is directed to removing removable media from a storage device of the system. Unlike claim 1, Crouse does not contain any teaching or suggestion of exporting removable media from a storage device such as a library according to a schedule. Further, Crouse does not contain any teaching or suggestion of receiving export identification data identifying one or more media to be exported and removed from a storage device.

Thus, Crouse does not disclose or suggest, as set forth in Applicants' claim 1, a method for exporting removable media in a storage device according to a schedule, comprising:

at a first time, receiving export identification data comprising first data identifying one or more removable media from the storage device to be exported and second data identifying a second time at which the one or more removable media is scheduled to be exported; storing the export identification data in a data file; and at the second time, using the stored export identification data to select the one or more removable media to be exported to export the selected media from the storage device. For at least the above reasons, claim 1 is patentable over the cited art.

Thus, Crouse does not disclose or suggest, as set forth in Applicants' claim 12, an administrative system for scheduling an export of one or more removable media from a storage device, the system comprising: a user interface for receiving, at a first time, export identification data comprising first data identifying one or more removable media from the storage device to be exported and second data identifying a second time at which the identified one or more removable media is scheduled to be exported; a data file stored in a memory device for storing the export identification data; and a task control subsystem for retrieving the export identification data at the second time from the data file and controlling the storage device to cause the export of the removable media identified by the media identification date. For at least the above reasons, claim 12 is patentable over the cited art.

Thus, Crouse does not disclose or suggest, as set forth in Applicants' claim 18, a data structure stored on a computer readable medium comprising first data identifying one or more removable media from a storage device and second data identifying a time at which the identified one or more removable media are scheduled to be exported from the storage device, the data structure being accessed by a task control application program at the second time to determine which one or more removable media are scheduled to be exported at the second time
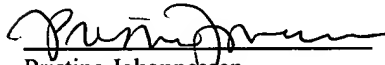
and to send a control signal to the storage device to initiate export of the identified one or more

removable media. For at least the above reasons, claim 18 is patentable over the cited art.

The dependent claims of the present application contain additional features that

further substantially distinguish the invention of the present application over Crouse and the

other prior art of record. However, given the applicants' position on the patentability of the

independent claims, it is not deemed necessary at this point to delineate such distinctions.

For at least all of the above reasons, Applicants respectfully request that the

Examiner withdraw all rejections, and allowance of all the pending claims is respectfully

solicited. To expedite prosecution of this application to allowance, the examiner is invited to call

the applicants' undersigned representative to discuss any issues relating to this application.
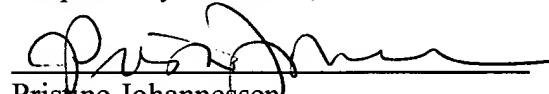
Respectfully submitted,

Dated: 12/16/04

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